

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re

VASCULAR ACCESS CENTERS, L.P.,

Debtor.

Chapter 11

Case No. 19-17117 (AMC)

Related D.I.:

**ORDER APPROVING TRUSTEE’S MOTION FOR AUTHORITY TO SETTLE
CLASSES OF PREFERENCE CLAIM CONTROVERSIES PURSUANT TO RULE
9019(b) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Upon consideration of the motion (the “**Motion**”)¹ filed by Stephen V. Falanga, in his capacity as chapter 11 trustee (the “**Trustee**”) for the bankruptcy estate of the above-captioned debtor (the “**Debtor**”), for authority to settle classes of preference claim controversies pursuant to Bankruptcy Rule 9019(b); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and notice of the Motion being sufficient under the circumstances; and it appearing that no other or further notice need be provided; and the Court having determined that the relief sought in the Motion is in the best interests of the Debtor’s estate and its creditors; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The Trustee is authorized, but not directed, to compromise and settle potential

Avoidance Actions pursuant to the following Settlement Procedures:

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

a. Avoidance Actions with Gross Transfers Sought Less Than \$100,000:

The Trustee will be free to consummate settlements in this class in his business judgment without further leave of the Court or additional notice to the parties that have been served with this Motion;

b. Avoidance Actions with Gross Transfers of \$100,000 to \$250,000:

The Trustee will be free to consummate settlements in this class in his business judgment by filing a Notice of Settlement with the Court, without further hearing, unless an objection is filed to the Notice of Settlement. The Notice of Settlement may include multiple settlements in one notice, and will provide an objection deadline of ten (10) days from the date of filing the Notice of Settlement. The notice of electronic filing of Notice of Settlement issued through the Court's Electronic Filing System shall constitute adequate and sufficient service of the Notice of Settlement. If an objection is filed, the objecting party and Trustee shall confer and, should the objection not be resolved, set the objection for hearing at the next regularly-scheduled omnibus hearing.

c. Avoidance Actions with Gross Transfers Greater Than \$250,000:

With regard to any Avoidance Action in which the gross transfers are \$250,000 or greater, the Trustee shall seek Court approval of the proposed settlement pursuant to Bankruptcy Rule 9019(a), or on such notice as is provided for in the plan or in documents governing any trust to which the Avoidance Actions may be transferred.

3. This Order shall be effective immediately upon entry, notwithstanding anything to the contrary in the Bankruptcy Rules or the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Pennsylvania.

4. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.